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March 28, 2012

FACT SHEET
DRAFT REMEDIAL ACTION PLAN FOR
FORMER OTAY SKEET AND TRAP SHOOTING RANGE
5350 HERITAGE ROAD, CHULA VISTA, CA

The County of San Diego, Department of Environmental Health (DEH) is holding a 30-day public comment period on a proposed cleanup plan for the Former Otay Skeet and Trap Shooting Range located at 5350 Heritage Road in Chula Vista, California (referred to as the "Site").

Since 2004, environmental investigations have been conducted at the Site. The investigations concluded that as a result of historic shooting range operations, the Site is impacted with lead pellets, lead in soil, target debris and polynuclear aromatic hydrocarbons (PAHs) in the target debris. The Site is also impacted with wood debris and perchlorate-containing fill material. The investigation also found impacts to groundwater beneath the Site. The Draft RAP has been prepared to address all known environmental impacts to soil and groundwater at the Site.

Flat Rock Land Company, LLC (Flat Rock), the owner of the property where the Site is located, is proposing a cleanup plan, also known as a Draft Remedial Action Plan (RAP), to address the contamination. The Draft RAP describes the investigation results and proposed cleanup activities at the Site. DEH seeks comment on the Draft RAP from interested members of the community.

This Fact Sheet provides you with the following information:

- Site Investigation and History
- Proposed Cleanup Plan
- California Environmental Quality Act (CEQA) – Mitigated Negative Declaration
- Public Comment Period and Who to Contact/Where to Go for More Information

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PUBLIC COMMENT PERIOD – MARCH 29, 2012 TO APRIL 30, 2012

DEH encourages you to review and comment on the proposed cleanup plan as set forth in the Draft RAP. DEH is holding a 30-day public comment period beginning March 29, 2012, and ending April 30, 2012. All comments must be postmarked by April 30, 2012 and emailed comments must be received no later than 5:00 p.m. on that same day.

Please submit your comments to:

Mr. James Clay – DEH Environmental Health Specialist III
5500 Overland Avenue, Suite 110 (P.O. Box 129261), San Diego, CA 92123-1202
Ph: (858) 505-6969 Email: james.clay@sdcounty.ca.gov

DEH will hold a public meeting to discuss the Draft RAP and proposed cleanup, answer questions and receive public comments.

PUBLIC MEETING – APRIL 5, 2012

Location: City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910
Building 100, Conference Room 106 (City Council Chambers)

Site Description and History
The Site, which is also referred to as Parcel A, covers a total area of approximately 268 acres. The shooting range was in operation at various times from at least the mid-1960s through approximately the mid-1990s under different ownership and by different operators. The Site is currently vacant, and is fenced.

Site Investigations and Human Health Risk Assessment
In 2004, the County of San Diego Department of Environmental Health (DEH), was designated by the California Environmental Protection Agency (Cal/EPA) as the Administering Agency for environmental oversight regarding investigation and eventual clean up of the Site. The designation of DEH as the "lead agency" was done under State law (under Section 25260 – 25268 of the California Health and Safety Code; AB 2061).

A number of investigations were subsequently performed in coordination with and under the oversight of DEH by the project proponent and property owner, Flat Rock. Those investigations resulted in the identification of areas of interest, as follows:

- Remediation Area 1 (RA1) consisting of approximately 31.3 acres and impacted by shooting range activities (and including the *Shooting Range Field*, the *Berm*, the *Sewer*, the *Target Debris Field*, the *White Material*, and the *Shooting Range Trap Houses*).
- Remediation Area 2 (RA2) consisting of approximately 4.9 acres in biologically sensitive areas and impacted by shooting range activities (and including *Target Debris Field*, the *Berm*, and the *Otay River Flood Plain*).
- Remediation Area 3 (RA3) consisting of approximately 1.4 acres and impacted by past wood recycling activities (and including the *Wood Debris Pile*).

In November 2005, Flat Rock submitted to DEH a Remedial Investigation/Feasibility Study (RI/FS) Report, which documented the various investigations conducted to date at the Site. In 2006, DEH requested that the California Department of Toxic Substances Control (DTSC) assist DEH in the cleanup process and the review of the RI/FS Report by taking on a formal consultative role, with DEH continuing to act as the lead agency.

Flat Rock in 2007 and 2008 performed additional site assessment work regarding metals in soil. This work addressed certain gaps in data collection identified by DTSC, and also assisted in undertaking and completing the agency-approved Baseline Human Health Risk Assessment process that concluded in 2009. During this time (and continuing to the present), Flat Rock has monitored groundwater from wells located on and around the Site.

Ecological Risk Assessment

As described above, the area known as RA2 is within the Otay River Flood Plain, which in turn is located in a biologically sensitive area. Flat Rock undertook to complete an ecological risk assessment to ensure protection of the biologically sensitive area within the flood plain and affected areas of the Chula Vista Multiple Species Conservation Program (MSCP) Preserve Area.

In March 2011, Flat Rock submitted to DEH and DTSC a report that presented the final results of the ecological assessment process, along with a plan for post-remediation soil sampling in designated areas of the Otay River flood plain and RA2. In April 2011, DTSC documented its review of the Final Ecological Phase I Predictive Assessment, and confirmed that all requested items were addressed. As a result, ecological risk at the Site has been adequately evaluated and assessed.

Proposed Cleanup Alternatives

The Draft RAP evaluates cleanup alternatives and identifies a preferred alternative to prevent or reduce potential risks to public health and the environment. Cleanup alternatives are evaluated based on a variety of factors, including effectiveness, ability to be implemented, community and local and state government acceptance, and cost. The Draft RAP then identifies the alternative that DEH believes is the most appropriate for the Site. The following cleanup alternatives were evaluated as “retained alternatives” for the Site:

1. No Action - This alternative was evaluated to provide a baseline against which other cleanup alternatives can be compared. This alternative would involve no cleanup action and the Site would remain in its current condition.

2. Containment Using Consolidation and Capping - This alternative would use either an Engineered Unit using the Area of Contamination (AOC) approach or a Corrective Action Management Unit (CAMU). The containment of material by consolidating and capping would involve excavating some areas of the Site and consolidating the material in another area of the Site and then capping the material.

3. Offsite Disposal - Under this alternative, impacted soil would be excavated, stockpiled and characterized to assess its waste classification, and then loaded and transported to one or more off-Site landfills. Based on the waste classification, the impacted soil would be transported to various facilities, including those that accept non-hazardous waste, and hazardous waste. Approximately 3,250 to 3,820 truckloads of impacted soil would be transported offsite, impacting traffic in the surrounding community.

4. Soil Treatment Using Onsite Stabilization Combined with Off-Site Disposal - This alternative, Stabilization, also referred to as solidification and fixation, is the encapsulation or physical adhesion of waste by a reagent material. Stabilization converts the lead into a less soluble form, and therefore, a less mobile form. Reagents include conventional cement-based process in which soil is mixed with Portland cement as well as reagents consisting of

phosphate, sulfate, carbonates and other compounds. Prior to offsite disposal, the soil must be treated and then tested to make sure it meets appropriate levels.

5. Physical Separation Using Lead Pellet Removal by Wet Screening and Gravity Separation Combined with Disposal - The wet screening and gravity separation alternative utilizes a technique for removing lead pellets and target debris from soil. Impacted soil is sieved to separate it into various size fractions and to eliminate larger debris. The fractions that could potentially contain lead pellets are further sieved as a wet slurry into smaller fractions. Fractions that could potentially contain lead pellets are then subjected to a mining-based density separation process at which time the lead pellets are recovered. Process water is recycled throughout the process. Recovered lead pellets could be recycled. Once treated, the soil would be segregated based on its waste classification, and retained onsite as non-hazardous, disposed offsite at a local landfill, or disposed offsite at a Class I landfill if it is a hazardous waste. Recovered lead pellets would be recycled.

All remedial activities considered are presented in the Draft RAP, which can be viewed at the information repositories listed at the end of this Fact Sheet. The Draft RAP can also be viewed online in DTSC's EnviroStor database, at:
http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000469

Recommended Cleanup Alternative
Based on a complete evaluation of alternatives, Alternative 2 (above) is recommended for the Site. The Containment Using Consolidation and Capping using the AOC approach alternative was deemed to offer the best combination of removal and effective containment for the protection of human health and the environment, and was also determined to provide a preferred level of cost and certainty compared to the other alternatives.

Proposed Schedule
Upon approval of the Draft RAP, a remedial design and implementation plan (RDIP) will be prepared to guide the cleanup of the Site. Work is anticipated to begin later in 2012, and possibly extend into 2013. All remedial activities will be coordinated to minimize disruption to the neighboring community and City of Chula Vista.

Next Steps
After the close of the public comment period, DEH will prepare a Response to Comments document. The document will include a response to all comments received during the 30-day public comment period. A copy of the Response to Comments will be provided to those who comment, so long as contact information is provided. DEH will consider all comments prior to making a final decision on the Draft RAP. The document will be placed in the information repositories that have been set up for the Site, and will be posted online as well.

California Environmental Quality Act
As required by the California Environmental Quality Act (CEQA), the County of San Diego evaluated the cleanup to determine the potential environmental impacts of the cleanup process as described in the Draft RAP. The County of San Diego has determined there will be impacts to the environment due to the cleanup process, and that such impacts may be addressed through project design features and mitigation measures. This finding is documented in an Initial Study and a proposed Mitigated Negative Declaration (MND) which is available for review in the Information Repositories.

Information Repositories/Administrative Record
DEH encourages you to review the Draft RAP, and other Site-related documents, which are available at the following locations:

DEH – File Room
5500 Overland Avenue
Suite 110
San Diego, CA 92123-1202
(858) 505-6969 (contact: James Clay)

South Chula Vista Library
389 Orange Avenue
Chula Vista, CA 91911
(619) 585-5792 (contact: Gayle Eatman-Varm)

The complete project file is available for review at these locations as well.

Para obtener una copia de la Hoja Informativa en el idioma español, llame a James Clay en el Departamento de Salud Ambiental del Condado de San Diego, al (858) 505-6969, o comuníquese por correo electrónico, James.Clay@sdcounty.ca.gov. Favor de incluir su nombre y dirección y se le proporcionará una copia de este documento.